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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT  
IN SUPPORT OF PLAINTIFFS' OMNIBUS  
BRIEFING RE: EXISTING WRITTEN  
DISCOVERY**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and, if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. § 1746 and Local Rule 6-3 in support of Plaintiffs’ Omnibus Briefing re: Existing Written Discovery Disputes.

2. Attached as **Exhibit A** is a true and correct copy of email exchanges between Plaintiffs’ and Defendants’ counsel on September 19 and 20, 2024.

3. Attached as **Exhibit B** are true and correct copies of excerpts of Plaintiffs’ interrogatories and Meta’s responses, as referenced in the joint brief.

4. Attached as **Exhibit C** are true and correct copies of excerpts of Plaintiffs’ requests for production and Meta’s responses, as referenced in the joint brief.

5. Attached as **Exhibit D** is a true and correct copy of the declaration of Jonathan Krein, PhD, dated November 6, 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 8<sup>th</sup> day of November, 2024, in San Francisco, California.

By: /s/ Maxwell V. Pritt  
Maxwell V. Pritt